

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

CIVIL ACTION NO: 05-CV-40072 FDS

LANDWORKS CREATIONS, LLC)	
)	
Plaintiff)	
)	
v.)	
)	
UNITED STATES FIDELITY AND)	PLAINTIFF'S EMERGENCY
GUARANTY COMPANY and)	MOTION TO EXTEND TIME
LOVETT-SILVERMAN CONSTRUCTION)	TO RESPOND TO THE
CONSULTANTS, INC.)	MOTION FOR SUMMARY
)	JUDGMENT FILED BY
Defendants)	LOVETT-SILVERMAN
)	

Now comes the Plaintiff, Landworks Creations, LLC ("the Plaintiff") and requests that this Honorable Court extend the time to respond to the Motion for Summary Judgment filed by Defendant, Lovett-Silverman Construction Consultants, Inc. until Monday, May 1, 2007.

As grounds for this motion, it is noted that Plaintiff's counsel's office is closed for a substantial portion of early to mid April to accommodate religious observances. Conforming to the filing schedule created by the date of filing of the motion by the filing Defendant burdens those observances.

Plaintiff does not, by this motion, believe it necessary to adjust its request for a speedy trial, a motion still pending before this Court.

WHEREFORE, it is respectfully requested that the deadline for the filing of the opposition be extended until May 1, 2007.

Respectfully Submitted,

Landworks Creations, LLC

By its attorney,

s/Robert N. Meltzer

The Mountain States Law Group

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Dated: April 2, 2007

CETIFICATE OF COMPLIANCE WITH L.R. 7.1

I, Robert N. Meltzer, certify that I have advised opposing counsel of my intent to file this motion, as required by L.R. 7.1. It has been indicated that counsel for Lovett-Silverman will not oppose this motion.

s/Robert N. Meltzer

April 2, 2007

CERTIFICATE OF SERVICE

I, Robert N. Meltzer, do hereby certify that on this day I served a copy of the foregoing on all counsel of record by mailing the same, postage prepaid, to:

Hermes, Netburn, O'Connor & Spearing
265 Franklin Street, Seventh Floor
Boston, MA 02109
Attn: Eric C. Hipp, Esq.

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Attn: Jay Gregory, Esq.

s/Robert N. Meltzer

April 2, 2007